

1 JEAN E. WILLIAMS  
2 Deputy Assistant Attorney General  
3 Environment & Natural Resources Division

4 SHAUN M. PETTIGREW  
5 Trial Attorney  
6 Natural Resources Section  
7 CA Bar No. 254564  
8 601 D Street NW  
9 Washington, D.C. 20004  
10 (202) 305-3895  
11 shaun.pettigrew@usdoj.gov

12 *Counsel for Federal Defendants*

13 **IN THE UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 SIERRA TRAIL DOGS MOTORCYCLE AND )  
16 RECREATION CLUB; PINE NUT MOUNTAINS )  
17 TRAIL ASSOCIATION; AMERICAN )  
18 MOTORCYCLIST ASSOCIATION, DISTRICT )  
19 36; CALIFORNIA FOUR WHEEL DRIVE )  
20 ASSOCIATION; and THE BLUE RIBBON )  
21 COALITION, )

22 Plaintiffs, )

23 vs. )

24 UNITED STATES FOREST SERVICE; )  
25 HUMBOLDT TOIYABE NATIONAL FOREST; )  
26 WILLIAM ("BILL") DUNKELBERGER, Forest )  
27 Supervisor, Humboldt-Toiyabe National Forest )

28 Federal Defendants, )

and )

AMERICAN BIRD CONSERVANCY, CENTER )  
FOR BIOLOGICAL DIVERSITY, WESTERN )  
WATERSHEDS PROJECT, WILDEARTH )  
GUARDIANS, )

Proposed Intervenor-Defendants )

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
MAY 20 2019	
CLERK US DISTRICT COURT	
DISTRICT OF NEVADA	
BY: _____	DEPUTY

No. 3:18-cv-00594-MMD-CBC

**JOINT PROPOSED BRIEFING  
SCHEDULE**

The parties hereby agree that the above-captioned action is an action for review on an administrative record that can be resolved by cross motions for summary judgment.

Accordingly, the parties request an order establishing the following briefing schedule under Local Rule 16-1(c):

Administrative Record:

- A. Federal Defendants shall lodge the Administrative Record on or before **June 6, 2019**.
- B. Plaintiffs and Proposed Intervenor-Defendants shall notify Federal Defendants of any objections to the Administrative Record on or before **July 12, 2019**.
- C. If objections to the Administrative Record are not resolved, the objecting party shall file any motion challenging the Administrative Record on or before **August 9, 2019**.
- D. If the objecting party files a motion challenging the Administrative Record, then District of Nevada Local Rule 7-2(b) will apply, and Federal Defendants' response is due within 14 days of the filing of the motion, and the movant's reply due within 7 days of the filing of the response.

Cross Motions for Summary Judgment

- A. Plaintiffs' Motion for Summary Judgment and Opening Brief is due within 35 days from:
  - 1. **August 16, 2019**, if no party objects to the Administrative Record;
  - 2. **August 30, 2019**, if any party objects but does not file a motion challenging the Administrative Record; or
  - 3. the day the Court issues a decision on the motion, if a party files a motion challenging the Administrative Record.
- B. Federal Defendants' Combined Cross Motion for Summary Judgment and Response to Plaintiffs' Motion for Summary Judgment is due 42 days from the filing of Plaintiffs' Motion for Summary Judgment.
- C. Proposed Intervenor-Defendants' Combined Cross Motion for Summary Judgment and Response to Plaintiffs' Motion for Summary Judgment is due 7 days from the filing of Federal Defendants' Cross Motion for Summary Judgment.
- D. Plaintiffs' Combined Response/Reply Brief is due 28 days from the filing of

Proposed Intervenor-Defendants' Cross Motion for Summary Judgment.

E. Federal Defendants' Reply Brief is due 28 days from the filing of Plaintiffs' Response/Reply Brief.

F. Proposed Intervenor-Defendants' Reply Brief is due 7 days from the filing of Federal Defendants' Reply Brief.

Respectfully submitted this 13th day of May, 2019,

JEAN E. WILLIAMS  
Deputy Assistant Attorney General  
Environment & Natural Resources Division

/s/ Shaun M. Pettigrew  
SHAUN M. PETTIGREW  
Trial Attorney  
Natural Resources Section

Counsel for Federal Defendants

MSBT LAW, CHTD.

/s/ Paul A. Turcke  
PAUL A. TURCKE, ESQ.

ERICKSON, THORPE & SWAINSTON, LTD.

/s/ John C. Boyden  
JOHN C. BOYDEN, ESQ.

Attorneys for Plaintiffs

ENVIRONMENTAL LAW CLINIC  
Mills Legal Clinic at Stanford Law School

/s/ Deborah A. Sivas  
DEBORAH A. SIVAS

Counsel for Proposed Intervenor-Defendants

IT IS SO ORDERED

[Signature]  
U.S. MAGISTRATE JUDGE

DATED: 5/20/2019

**CERTIFICATE OF SERVICE**

I hereby certify that on May 13, 2019, I electronically transmitted the foregoing to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all CM/ECF registrants for this matter.

/s/ Shaun M. Pettigrew  
Shaun M. Pettigrew